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Attorneys for Plaintiff
JOHNNY PHILAVANH

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOHNNY PHILAVANH,)	Case No.: 2:15-cv-01796-APG-GWF
)	
Plaintiff,)	UNOPPOSED MOTION TO EXTEND
)	BRIEFING SCHEDULE
vs.)	
)	
)	
CAROLYN W. COLVIN, Acting)	
)	
Commissioner of Social Security,)	
)	
Defendant)	

Plaintiff Johnny Philavanh (“Plaintiff”) and defendant Carolyn Colvin, Acting Commissioner of Social Security (“Defendant”), through their undersigned counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to October 28, 2016; and that Defendant shall have 30 days or until November 28,

1 2016, to file her opposition, if any is forthcoming. Any reply by plaintiff will be
2 due December 19, 2016.

3 An extension of time for plaintiff is needed due to a serious illness. The
4 spouse of the associate in Counsel's firm who this matter is assigned is dealing with
5 his Spouse's terminal illness which has unexpectedly worsened in the last few
6 weeks. Subsequent to the surgical procedure and hospitalization as describe in the
7 prior request to extend the briefing schedule, Counsel's spouse was also admitted
8 on August 1, 2016 and then discharged on August 5, 2016, to provide treatment for
9 intractable pain related to the terminal illness. Upon discharge from the hospital,
10 due to a deterioration in her condition in the last few weeks, Counsel's spouse now
11 requires in home medical assistance 24 hours a day and Counsel has been required
12 to devote time to planning and managing the transition to end of life care. Counsel
13 required time to deal with this change in condition and has taken steps to secure the
14 at home hospice level care which his spouse now requires in order to better allow
15 him to attend to his professional obligations.

16 Counsel sincerely apologizes to the court for any inconvenience this may
17 have had upon it or its staff.

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1 DATE: September 26, 2016, Respectfully submitted,

2 ROHLFING & KALAGIAN, LLP

3
4 /s/ *Marc V. Kalagian*

5 BY: _____

Marc V. Kalagian

6 Attorney for plaintiff JOHNNY PHILAVANH

7 DATED: September 26, 2016 Daniel G. Bogden
8 United States Attorney

9 */S/ Sharon Lahey

10 _____
Sharon Lahey

11 Special Assistant United States Attorney

12 Attorney for Defendant

13 [*Via email authorization]

14
15 IT IS SO ORDERED:

16 *George Foley Jr.*

17 UNITED STATES MAGISTRATE JUDGE

18
19 DATED: 10/07/2016
20 _____